State Form 4336

F. Wright EPA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

TO: S. Boyle 5-23-89

DFFICE MEMORANDUM

DATE: May 3, 1989

THRU:

Karyl Schmidt K5 5-4-89

Harold Templin # 5/3/89

TO:

FROM:

Robert D. Malone Enforcement Section

Bob Martin RM 5/3/89 Geology Section

SUBJECT Review of AMLAND Response to December 13, 1988, Letter Of Warning

> Staff has completed review of the March 13, 1989, Chrysler Motors Corporation (formerly AMLAND Corporation) response to the IDEM Letter Of Warning (LOW) dated December 13, 1988. The following comments correspond to items enumerated in the LOW.

- 1. Documentation substantiating boring and well construction details for specified wells are not found.
- 2. Wells identified in the LOW to have silted-in are not technically part of the post-closure care monitoring system. However, if these wells are to provide future information relating to ground water quality, these wells should first be redeveloped prior to sampling.
- 3. 8. The facility assures items 3 through 8 will be compiled with in the future. A copy of the LOW will be sent to the sampling contractor requesting that sampling details be strictly followed and incorporated into the sampling plan.
- 9. A locking cap was installed on well TWC in December, 1986. However, the response does not indicate that a protective casing was also installed.
- 10. A revised sampling and analysis plan (SAP) was not submitted in the LOW. The SAP contained in the post-closure care plan dated February 17, 1986, was approved by IDEM on May 9, 1986. The SAP contained in this document, however, is severely deficient in all respects and should be revised as requested.
- 11. To assure the SAP is followed, the facility plans to conduct periodic sampling inspections of their own.
- 12. The LOW response did not comply with this request i.e., specific statistical procedures were not identified.

RM/11

cc: Fayola Wright, U.S. EPA, Region V RCRA Ground Water File (IF)